

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
CHARLOTTSVILLE DIVISION**

BABY DOE, *et al.*,

Plaintiffs-Counterclaim Defendants,

-v.-

JOSHUA MAST, *et al.*,

Defendants-Counterclaim Plaintiffs,

CIVIL NO: 3:22-cv-00049-NKM-JCH

**CONSENT MOTION FOR EXTENSION AND TO SET AN AMENDED BRIEFING  
SCHEDULE FOR RESPONSE/REPLY TO MOTION TO DISMISS RICHARD MAST'S  
COUNTERCLAIMS**

Defendant-Counterclaim Plaintiff Richard Mast, with the consent of Plaintiffs-Counterclaim Defendants John and Jane Doe, respectfully ask that the Court extend the time for Richard Mast to respond to John and Jane Doe's motion to dismiss the counterclaims one week from October 14, 2024 (as set by this Court's Order, dated August 21, 2024 [Dkt. No. 480]) to October 21, 2024, and commensurately reset the Does' reply deadline to November 6, 2024.

This motion is based upon exigent personal circumstances overseas for the undersigned requiring his immediate attention.

WHEREFORE, Defendant-Counterclaim Plaintiff Richard Mast respectfully asks the Court to extend the time for his response to Plaintiffs-Counterclaim Defendants' motion to dismiss the counterclaims to October 21, 2024, and Counterclaim Defendants' reply to November 6, 2024. A proposed Order is attached.

//

//

//

Dated: October 10, 2024

Respectfully submitted,

/s/ David Yerushalmi

David Yerushalmi, Esq.\*  
American Freedom Law Center  
2020 Pennsylvania Avenue NW, Suite 189  
Washington, D.C. 20006  
(\*Admitted *pro hac vice*)

E. Scott Lloyd  
Lloyd Law Group, PLLC  
Va. Bar # 76989  
20 E. 8th Street, Suite 3  
Front Royal, VA 22630  
Office: (540) 823-1110  
Cell: (540) 631-4081  
Fax: (540) 583-4279  
[scott@lloydlg.com](mailto:scott@lloydlg.com)

*Counsel for Defendant Richard Mast*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 10, 2024, a copy of the foregoing was filed electronically.

Notice of this filing will be sent to all parties for whom counsel has entered an appearance by operation of the Court's electronic filing system. Parties may access this filing through the Court's system. I further certify that a copy of the foregoing has been served by ordinary U.S. mail upon all parties for whom counsel has not yet entered an appearance electronically: none.

*/s/*David Yerushalmi  
David Yerushalmi, Esq.